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District Counsel for Tulare Local Healthcare District

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry St.
Tulare, CA 93274

CASE NO. 17-13797

Chapter 9

DC No.: WW-43

Date: August 23, 2018
Time: 9:30 a.m.
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

**SUPPLEMENTAL DECLARATION OF DANIELLE J. BETHEL IN SUPPORT OF
MOTION FOR SUBSEQUENT EXTENSION OF DEADLINE TO ASSUME OR REJECT
NON-RESIDENTIAL REAL PROPERTY LEASES SETTING FORTH WRITTEN
CONSENT OF LESSORS TO RELIEF REQUESTED**

1 I, Danielle J. Bethel, hereby declare and represent as follows:

2 1. My name is Danielle J. Bethel. I am attorney at Walter Wilhelm Law
3 Group ("W2LG") which is counsel for Tulare Local Healthcare District, dba Tulare
4 Regional Medical Center ("District" or "Debtor). The District is the Debtor in the above
5 captioned Chapter 9 case.
6

7 2. W2LG maintains an office at 205 E. River Park Circle, Suite 410, Fresno,
8 California 93720.

9 3. I have personal knowledge that the facts set forth in this declaration are
10 true, except on those matters stated on information and belief, which I believe to be
11 true. If I were called as a witness in connection with this proceeding, I could and would
12 testify competently to the matters stated herein.
13

14 4. On July 26, 2018, the District filed a Motion for Subsequent Extension to
15 Assume or Reject Non-Residential Real Property Lease (Dkt. 612; WW-43).

16 5. The Motion set forth the three (3) unexpired non-residential real property
17 leases to which the District is a lessee as follows: (1) Lease between the District and
18 Heiskell Ranches, LP for 880 E. Merritt, Suites 105-106, Tulare, California ("Family X-
19 Ray Center Lease"); (2) Lease between the District and Heiskell Ranches, LP for 880 E.
20 Merritt, Suites 107-109, Tulare, California ("Mineral Kings Toxicology Lease"); and (3)
21 Lease between the District and City of Tulare for 325 N. West St., Tulare, California
22 ("Westside Clinic Lease").
23

24 5. The purpose of this declaration is to set forth the required written consent
25 of the lessors as required by 11 U.S.C. § 365(d)(4)(B)(i) for subsequent extensions of
26 time to assume non-residential real property leases.
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1 6. The District has obtained the written consent of the City of Tulare to the
2 relief requested by the Motion. Attached as Exhibit "A" is a true and correct copy of the
3 Consent to Subsequent Extension of Deadline to Assume or Reject Non-Residential
4 Real Property Leases (City of Tulare), which has been executed by Andrew J.
5 Brownson of Griswold, Lasalle, Cobb, Dowd & Gin, LLP, attorneys for the City of Tulare.
6 This consent pertains to the Westside Clinic Lease.
7

8 7. Additionally, the District has obtained the written consent of Heiskell
9 Ranches, LP to the relief requested by the Motion. Attached as Exhibit "B" is a true and
10 correct copy of the Consent to Subsequent Extension of Deadline to Assume or Reject
11 Non-Residential Real Property Leases ("Heiskell Consent"), which was executed by
12 Don J. Pool of Wild, Carter & Tipton, attorneys for Heiskell Ranches, LP. This consent
13 pertains to the Family X-Ray Lease and the Mineral Kings Toxicology Lease.
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15 I declare under penalty of perjury under the laws of the United States of America
16 that the foregoing is true and correct to the best of my information and belief.

17 Executed this 8 day of August, 2018, at Fresno, California.

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20 Danielle J. Bethel
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